



United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

MEMORANDUM

SUBJECT: Request for Approval and Funding for a Removal Action at the Hope Iron and Metal Site, Hope, Hempstead County, Arkansas

FROM: Nicolas Brescia, On-Scene Coordinator
Prevention and Response Branch, Removal Team (6SF-PR)

TO: Carl E. Edlund, P.E., Director
Superfund Division (6SF)

THRU: Ronnie Crossland, Associate Director
Emergency Management Branch (6SF-E)

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the selected removal action described herein in accordance with the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604, for the Hope Iron and Metal Site, Hope, Hempstead County, Arkansas. This time-critical removal action provides for the removal of the threat to human health and the environment posed by the identified contaminants of concern listed herein that were a result of the actions conducted by this company.

The proposed plan of action meets the criteria for initiating a removal action under Section 300.415 of the National Contingency Plan (NCP), 40 C.F.R. § 300.415. This action is expected to require less than twelve months (from mobilization) and \$2 million to complete.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS:	ARD000607050
Category of Removal:	Time Critical
Site ID:	A6U4
Latitude:	33.675978 N
Longitude:	-93.594903 W



9797538

A. Site Description

1. Removal Site Evaluation

The site was first brought to the attention of the Arkansas Department of Environmental Quality (ADEQ) because of its location in a residential area and its previous use as a metal salvage yard that stored and drained PCB containing transformers. A Site Inspection (SI) was conducted by ADEQ in August 2012 and found the site to be contaminated with lead and PCBs. In March of 2015, the ADEQ conducted an Environmental Site Investigation (ESI) and determined that contaminants existed on the property in the soils which included metals, polychlorinated biphenyls (PCBs), and Polycyclic Aromatic Hydrocarbons (PAHs). ADEQ determined this site was associated with historic operations of the Hope Iron and Metal facility. Sampling of the area by the ADEQ showed contaminants in the soils. On September 14, 2015 the ADEQ requested EPA assistance with further assessment of the site and for a potential removal action.

After an extensive effort to identify property owners and gain access, on September 6 through September 9, 2016, EPA conducted sampling of the property and collected 98 five-point composite soil samples at depths from 1 to 48 inches below ground surface.

The investigations by both ADEQ and the EPA showed significant soil contamination which included primarily antimony, cadmium, lead, PCBs, and PAHs. A family with a child currently live on the property. The site is surrounded on three sides by homes.

2. Physical Location

The Site is located at 812 North Main Street, Hope, Hempstead County, AR 71801. The immediate area surrounding the site is primarily residential.

3. Site Characteristics

The Site is an old metal salvage yard. There are three structures on the site. Two of the structures are metal garages, and one is a mobile home. The current owner occupies and utilizes all structures. The only known remnants of the Hope Iron and Metal Site is the remaining soil contamination left behind as a result of its operations.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

The EPA has documented the resulting contamination and believes it to be associated with the former operations of the Hope Iron and Metal facility. The contaminants of concern are at levels above the EPA Risk Screening Levels. The contaminants of concern include antimony, cadmium, lead, PCBs, and PAHs and are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. 302.4.

5. NPL Status

This Site is not on the National Priorities List (NPL). The ESI completed by ADEQ was reviewed by EPA, and it was determined that the site fails to meet the minimum criteria required to be included, or proposed, at this time on the NPL.

6. Maps, Pictures and Other Graphic Representations

Attachment 1 Site Location Map

Attachment 2 Evaluation Area Map

Attachment 3 Enforcement Attachment (Confidential)

B. Other Actions to Date

1. Previous Actions

The following information may not be all inclusive, but encompasses the current information available regarding this Site.

August, 2012: ADEQ completed a SI and determined the following contaminants were present in the soil: aluminum, antimony, cadmium, cobalt, copper, iron, lead, manganese, thallium, PCBs and PAHs.

September, 2015: ADEQ completed an ESI and determined the following contaminants were present in the soil: aluminum, antimony, cadmium, cobalt, copper, iron, lead, manganese, thallium, PCBs and PAHs. ADEQ requested EPA assistance.

June-August, 2016: EPA determines property owners and gains site access.

September, 2016: EPA conducts a removal assessment of the property to determine extent of contamination. EPA determines that the following contaminants were present in the soil: antimony, cadmium, lead, PCBs and PAHs above risk based standards.

2. Current Actions

No current ongoing actions are being conducted.

C. State and Local Authorities' Role

1. State and Local Actions to Date

In September of 2015, ADEQ requested EPA to evaluate the ADEQ ESI, and conduct an emergency removal action at the site.

2. Potential for continued State/Local response

At this time, there are no additional actions anticipated by the State or Local Government entities. The Arkansas Department of Health (ADOH) has offered assistance with community involvement outreach once EPA begins a removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a removal action. Paragraphs (b)(2)(i), (iii), (iv) and (vii) directly apply to the conditions at the Site. Any one of these factors may be sufficient to determine whether a removal action is appropriate.

A. Threats to Public Health or Welfare

1. Exposure to Human Populations, Animals or the Food Chain, NCP Section 300.415(b)(2)(i).

A family with a child currently lives on the property. The site is currently fenced, however, it is accessible to the local population via an open gate. The predominant threat to human populations is the potential exposure to the contaminated soils by the most sensitive populations. Exposure to these hazardous substances could be from ingestion, skin absorption, and inhalation. Antimony, cadmium, lead, PCBs (Aroclor 1242, 1254 and 1260), and Poly Aromatic Hydrocarbons (PAHs: specifically, benzo(a)pyrene, benzo(a)anthracene, benzo(b)fluoranthene) are hazardous substance as defined at Section 101(14) of CERCLA, 42 U.S.C. 9601(14) and further defined at 40 C.F.R. 302.4.

2. High Levels of Hazardous Substances or Pollutants or Contaminants Soils Largely at or Near the Surface, that May Migrate, NCP Section 300.415(b)(2)(iv).

The hazardous substances located within soils are antimony, cadmium, lead, PCBs (Aroclor 1242, 1254 and 1260), and Poly Aromatic Hydrocarbons (PAHs: specifically, benzo(a)pyrene, benzo(a)anthracene, benzo(b)fluoranthene). The concentrations ranges are as follows and exceed the EPA Risk Screening Levels (RSLs) for these contaminants:

Antimony	up to 238 mg/kg	PCB: Aroclor 1242	up to 6.14 mg/kg
Cadmium	up to 71.8 mg/kg	PCB: Aroclor 1254	up to 245 mg/kg
Lead	up to 7,790 mg/kg	PCB: Aroclor 1260	up to 1640 mg/kg
benzo(a)pyrene	up to 2.06 mg/kg	PCB: Total	up to 1640 mg/kg

benzo(a)anthracene	up to 2.94 mg/kg
benzo(b)fluoranthene	up to 4.77 mg/kg

3. Availability of Other Response Mechanisms, NCP Section 300.415(b)(2)(vii).

Assistance was requested by ADEQ in September of 2015. ADEQ has requested EPA to conduct a removal action at the site.

B. Threats to the Environment

It is unlikely that there would be a significant ecological impact resulting from the contamination on the Site. This Site poses more of a human health threat due primarily to potential exposure to the contaminated soils.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants or contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to the public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The EPA anticipates the excavation of soils from the property. The excavated soils will be disposed within an appropriate and approved landfill followed by restoration of the property to pre-removal conditions. The cleanup levels to be used for this action are:

Antimony	23 mg/kg	PCB: Total	< 1mg/kg
Cadmium	5.7 mg/kg		
Lead	400 mg/kg		
Benzo(a)pyrene	1.60 mg/kg		

2. Contribution to Remedial Performance

Although Remedial Action is not anticipated, this action is consistent with any potential Remedial Action at this Site.

3. Applicable or Relevant and Appropriate Requirements

This removal action will be conducted to eliminate the actual or potential release of a hazardous substance, pollutant, or contaminant to the environment, pursuant to CERCLA, 42 U.S.C. § 9601 et seq., in a manner consistent with the NCP, 40 C.F.R. Part 300. As per 40 C.F.R. § 300.415(i), Fund-financed removal actions pursuant to CERCLA Section 104, 42 U.S.C. § 9604, and removal actions pursuant to CERCLA Section 106, 42 U.S.C. § 9606, shall, to the extent practicable considering the exigencies of the situation, attain the applicable or relevant and appropriate requirements under Federal environmental law, including the Toxic Substances and Control Act (TSCA), 15 U.S.C. § 2601 et seq., the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300 et seq., the Clean Air Act (CAA), 42 U.S.C. § 7401 et seq., Clean Water Act (CWA), 33 U.S.C. § 1251 et seq., the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq., or any promulgated standard, applicable or relevant and appropriate requirements, criteria, or limitation under a state environmental or facility citing law that is more stringent than any Federal standard, requirement, criteria, or limitation contained in a program approved, authorized or delegated by the Administrator and identified to the President by the state.

Due to the fact that consolidation and offsite disposal are the principal elements of this removal action, RCRA waste analysis requirements found at 40 C.F.R. §§ 261.20 and 261.30, RCRA manifesting requirements found at 40 C.F.R. § 262.20, and RCRA packaging and labeling requirements found at 40 C.F.R. § 262.30 are deemed to be relevant and appropriate requirements for this removal action. Because onsite storage of hazardous wastes by EPA is not expected to exceed ninety days, specific storage requirements found at 40 CFR Part 265 are not applicable or relevant and appropriate (See 40 CFR § 262.34). All hazardous substances, pollutants, or contaminants removed offsite for treatment, storage, or disposal shall be treated, stored, or disposed at a facility in compliance, as determined by EPA, pursuant to 40 CFR § 300.440. All offsite transportation of hazardous materials will be performed in conformity with U.S. Department of Transportation (DOT) requirements at 49 CFR § 172.

This action will be conducted in accordance with the substantive requirements of 40 CFR § 761 and specifically 40 CFR § 761.61(a) and (c) relative to PCB cleanup and disposal. Other specific TSCA requirements that may apply include 761.40 (marking), 761.65 (storage), 761.180 (recordkeeping) and 761.207 (manifesting).

4. Project Schedule

The EPA anticipates initiating such actions as quickly as possible to address the issues associated with the Site. The estimated time to conduct this removal action is approximately two months.

B. Estimated Costs

Extramural Costs:

ERRS	\$ 1,127,950
START-3	\$ 150,000
Contingency	\$ 225,590

TOTAL EXTRAMURAL COSTS \$ 1,503,540

The total budget for this removal action based on full-cost accounting practices that will be eligible for cost recovery. The budgeted costs are estimated to be **\$2,598,596**.

((Direct Cost) + (Indirect)) + (61.55% of Total Direct {Indirect Cost}) = Estimated EPA Cost for a Removal Action

$$\$1,503,540 + \$105,000 + (61.55\% \times \$1,503,540 + \$105,000) = \mathbf{\$2,598,596}$$

Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2002. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only, and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor the deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If this response action is not taken, the current residents will continue to be exposed to the contaminated soils, and surrounding residents can potentially be exposed to the contaminated soils. In addition, these contaminated soils may migrate with wind, water, and mechanical means which could result in the contamination of additional areas around the site.

VII. OUTSTANDING POLICY ISSUES

There are no known outstanding policy issues associated with this Site.

VIII. ENFORCEMENT

See Enforcement Attachment.

IX. RECOMMENDATION

This decision documents the selected removal action for the Hope Iron and Metal Site, Hope, Hempstead County, Arkansas developed in accordance with CERCLA, 42 U.S.C. § 9601 et seq., and not inconsistent with the NCP, 40 C.F.R. Part 300. This action was based on the administrative record for the Site. Because the conditions at the Site meet the criteria defined in Section 300.415 and 300.305 of the NCP I recommend your approval of the proposed removal action. The total CERCLA extramural project ceiling if approved will be \$1,503,540. Of this, an estimated \$1,353,540 will come from the Regional Removal Allowance.

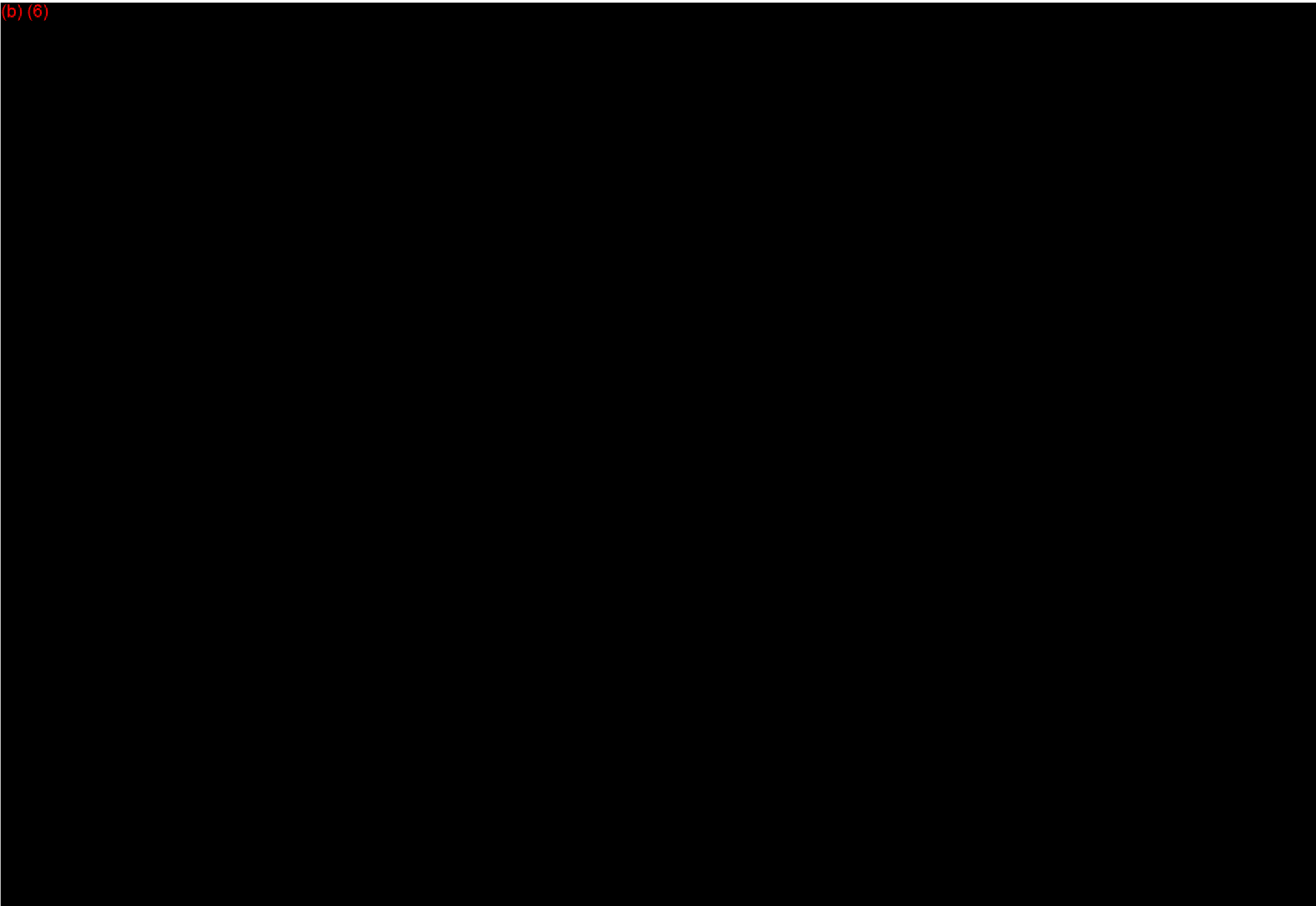
APPROVED: _____ DATE: _____

Attachments

- Attachment 1 Site Location Map
- Attachment 2 Evaluation Area Map
- Attachment 3 Enforcement Attachment (Confidential)

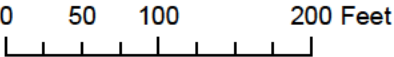
ATTACHMENT 1
SITE LOCATION MAP




(b) (6)



Hope Iron and Metal
Site Map-Aerial View
Figure 2-2

Legend:



-  Site Boundary
-  Former POL Boundary
-  Drainage



AFIN:
29-00525

Site Map-Aerial View

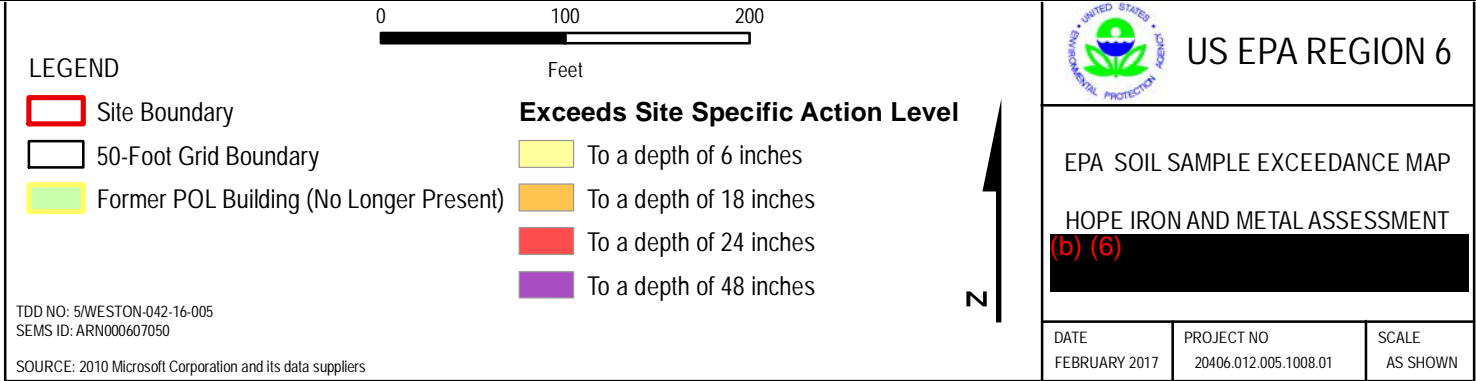
Location: *Hope, Arkansas*

County: *Hempstead*

Date: *August 2015*

ATTACHMENT 2
EVALUATION AREA MAP

(b) (6)



ATTACHMENT 3
ENFORCEMENT ATTACHMENT